

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

ARLENE M. BROWN,

Plaintiff:

V.

**THE BOEING COMPANY, EMPLOYEE
BENEFITS PLANS COMMITTEE,**

Defendant.

NO. 17-cv-01354 RSM

**STIPULATED MOTION FOR
EXTENSION OF TIME FOR RULE 26(F)
CONFERENCE, INITIAL DISCLOSURES,
AND JOINT STATUS REPORT**

AND ORDER

STIPULATION

The parties hereby file this stipulated motion pursuant to LCR 7(d)(1) and LCR 10(g) to request that the Court allow for an extension of the deadlines for the parties' FRCP 26(f) Conference, Initial Disclosures, and Joint Status Report (collectively, the parties' "Initial Scheduling Dates"). Absent an Order extending these deadlines, the parties' Initial Scheduling Dates are as follows, pursuant to the Court's September 27, 2017 Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt. #3): October 25, 2017 deadline for FRCP 26(f) Conference; November 1, 2017 deadline for FRCP 26(a)(1) Initial Disclosures; and November 8, 2017 deadline for Joint Status Report and Discovery Plan as required by FRCP 26(f) and LCR 26(f). (Id. at p. 1.)

1 On September 28, 2017, the parties filed a stipulation to extend Defendants' deadline for
2 their responses to Plaintiff's Complaint to Tuesday, October 31, 2017, given the length and
3 complexity of the Complaint's factual allegations. (Dkt. # 4.) The Court granted the stipulation
4 on September 29, 2017. (Dkt. # 5.)

5 On Tuesday, October 17, 2017 the parties conferred regarding the upcoming Initial
6 Scheduling Dates. Considering the factual issues presented by this suit, the one month extension
7 for responses to Plaintiff's Complaint until October 31, 2017, and the parties' respective
8 schedules (including holiday travel) in November, the parties jointly determined that they would
9 all benefit from additional time for Plaintiff to consider Defendants' responses to Plaintiff's
10 Complaint prior to engaging in the FRCP 26(f) Conference. Further, an extension of time of the
11 Initial Scheduling Dates would permit the parties to engage in more fruitful discussions
12 regarding the Joint Status Report. Accordingly, the parties jointly ask the Court to allow for an
13 extension of the Initial Scheduling Dates as follows:

- 14 • November 30, 2017: Deadline for FRCP 26(f) Conference
15 • December 8, 2017: Initial Disclosures Pursuant to FRCP 26(a)
16 • December 19, 2017: Combined Joint Status Report as Required by FRCP 26(f)

17 and LCR 26(f).

18 IT IS SO STIPULATED.

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

1 DATED this 23rd day of October, 2017.
2
3

4 FOX ROTHSCHILD LLP
5

6 s/ Arlene M. Brown (with permission)
7

8 Arlene M. Brown, *Pro Se*
9 239 SW 189th Pl.
10 Normandy Park, WA 98166
11 Phone: 206-431-8693
12 Email: pensionrights707@gmail.com

13 Plaintiff
14
15

16 s/ Robert M. Howie
17

18 Laurence A. Shapero, WSBA #31301
19 Robert M. Howie, WSBA #23092
20 Fox Rothschild LLP
21 1001 Fourth Avenue, Suite 4500
22 Seattle, WA 98154
23 Telephone: 206.624.3600
24 Facsimile: 206.389.1708
25 Email: lshapero@foxrothschild.com
26 rhowie@foxrothschild.com

27 Emily Glunz, *pro hac vice*
28 Deborah Davidson, *pro hac vice*
29 Morgan Lewis & Bockius LLP
30 77 West Wacker Drive, Fifth Floor
31 Chicago, IL 60601
32 Telephone: 312-324-1000
33 Facsimile: 312-324-1001
34 Email: Emily.glunz@morganlewis.com
35 Deborah.davidson@morganlewis.com

36 Attorneys for Defendant
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

ORDER

The stipulation of the parties is hereby entered. The revised Initial Discovery Deadlines are as follows:

- November 30, 2017: Deadline for FRCP 26(f) Conference
 - December 8, 2017: Initial Disclosures Pursuant to FRCP 26(a)
 - December 19, 2017: Combined Joint Status Report as Required by FRCP 26(f) and LCR 26(f).

DATED this 25th day of October 2017.

Ricardo S. Martinez
RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

FOX ROTHSCHILD LLP

By: s/ Robert M. Howie
Laurence A. Shapero, WSBA #31301
Robert M. Howie, WSBA #23092

Deborah S. Davidson (*pro hac vice*)
Emily A. Glunz (*pro hac vice*)
Attorneys for Defendants

By: s/Arlene M. Brown
Arlene M. Brown, *Pro Se*
Plaintiff